



Defense Security Service

Industrial Security Field Operations

FCL Orientation Handbook

April 2017



Table of Contents

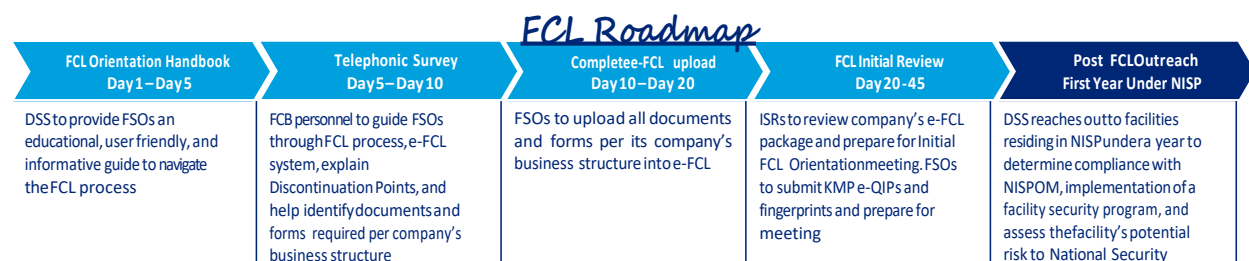
WELCOME MESSAGE FROM DSS DIRECTOR	3
1.0 FCL ROADMAP	5
2.0 FCL PROCESS REQUIREMENTS WORKSHEET	6
3.0 BUSINESS STRUCTURE AND EXCLUDED TIER ENTITIES	8
3.1 BUSINESS STRUCTURE REQUIRED DOCUMENTS	8
3.2 REQUIRED FORMS	10
3.2.1 Required e-FCL Forms Signatures per Business Structure	10
3.3 EXCLUDED TIER ENTITY PROCESS	12
3.3.1 In-Process Excluded Tier Entity Requirements	12
3.3.2 Highest Cleared Excluded Tier Entity	13
4.0 E-FCL PROCESS	14
4.1 LOGGING INTO E-FCL	14
4.2 E-FCL IN 5 STEPS	14
5.0 ACCOUNTS AND SYSTEMS	15
6.0 TELEPHONIC AND FCL INITIAL REVIEW PREPARATION	17
6.1 TELEPHONIC SURVEY PREPARATION	17
6.2 FCL INITIAL REVIEW	17
APPENDIX A: REQUIREMENTS	18
A.1 REQUIRED E-FCL FORMS AND DOCUMENTS	18
A.2 REQUIRED KMPPCLS	19
A.3 DEFINING KMP AUTHORITIES OF POSITION	19
A.4 TRAINING	21
APPENDIX B: E-FCL FAQs	22
APPENDIX C: EXCLUSION RESOLUTIONS	24
C.1 HIGHEST CLEARED ENTITY NOTING EXCLUDED ENTITY'S EXCLUSION AND RESOLUTION TO EXCLUDE PARENT ORGANIZATION	24
C.2 EXCLUSION RESOLUTION OF CORPORATE ORGANIZATION	25
C.3 EXCLUSION RESOLUTION FOR LLC MEMBER	26
C.4 EXCLUSION RESOLUTION FOR CERTAIN DIRECTORS AND OFFICERS	27
APPENDIX D: GLOSSARY	28
D.1 TERMS/ACRONYMS	28
D.2 BUSINESS STRUCTURE	29



Welcome Message from DSS Director

On behalf of the Defense Security Service (DSS), welcome to the first step in the Facility Security Clearance (FCL) process. We recently received a request from a Government Contracting Activity (GCA) or cleared contractor to sponsor your facility for a FCL under the National Industrial Security Program (NISP) for performance on a classified government contract.

DSS is delegated security administration responsibilities and is the Cognizant Security Office (CSO) on behalf of the Department of Defense (DoD). As the CSO, DSS will advise and assist your facility during the FCL process and while you are under our cognizance in the NISP. Your facility will be required, at a minimum, to execute certain designated forms such as the Department of Defense Security Agreement, DD Form 441 (or DD Form 441-1 for a division/branch facilities); process Key Management Personnel (KMP) for personnel security clearances; and *appoint a U.S. citizen employee as the Facility Security Officer (FSO)*.



FSO Responsibilities and Discontinuation Points in the FCL Process

Over the course of the next 45 days it is your responsibility to identify your company's business structure and provide required documentation and forms. To make this process transparent, the FCL Orientation Handbook provides a roadmap to guide you along the FCL process. In addition to the FCL Orientation Handbook, a DSS Industrial Security Specialist will contact you shortly to assist in obtaining your facility's FCL.

There are three discontinuation points during the FCL process:

1. Failure to upload the required documentation and forms in the Electronic-Facility Security Clearance (e-FCL) system within 20 days after receipt of the FCL Orientation Handbook
2. Failure to submit KMP Electronic Questionnaire for Investigations Processing (e-QIPs) within 45 days after the receipt of the FCL Orientation Handbook
3. Failure to submit KMP fingerprints within 14 days after submitting KMP e-QIPs

First Year Post FCL Responsibilities

Once the Facility Clearance Branch (FCB) issues an FCL, you are required to comply with the DoD 5220.22-M "National Industrial Security Program Operation Manual (NISPOM)" and implement a security program. An Industrial Security Representative (IS Rep or ISR, for short) will reach out to your facility 120 days after the FCL is issued to conduct a brief outreach assessment of your facility's compliance with NISPOM requirements and implementation of its facility security program and additionally, per NISPOM Change 2, effective May 2016, an insider threat program.

Daniel E. Payne
Director, Defense Security Service



Overview of the National Industrial Security Program (NISP)

The NISP was established by Executive Order 12829, as amended, in January of 1993 for the protection of classified information. The NISP applies to all executive branch departments and agencies, and to all cleared contractor facilities located within the United States, its territories and possessions.

Participation is voluntary, but access to classified information will not be permitted otherwise. When your facility receives its FCL, it will be subject to provisions of the NISPOM. You will find a link for downloading the NISPOM at the DSS web site (<http://www.dss.mil>) under the Industrial Security tab. You are expected to review and become familiar with the NISPOM. The FCL Orientation Handbook is not intended to replace the NISPOM.

The classification levels in the NISP are CONFIDENTIAL, SECRET, and TOP SECRET. The FCL level your facility receives is based upon the classified contract you have been awarded and its requirements. Interim clearances which are based upon lesser investigative requirements, may be issued at each of these levels. An Interim FCL may be granted under certain conditions if your facility qualifies. There may be conditions that exist that may preclude the issuance of an interim FCL.

An FCL cannot be issued until required KMP are cleared, the e-FCL package is approved, and the initial orientation meeting completed.

If your company has other companies in its legal structure, a decision will be made to either clear or exclude them. The assigned IS Rep will decide course of action during their review of the documentation in the e-FCL system.

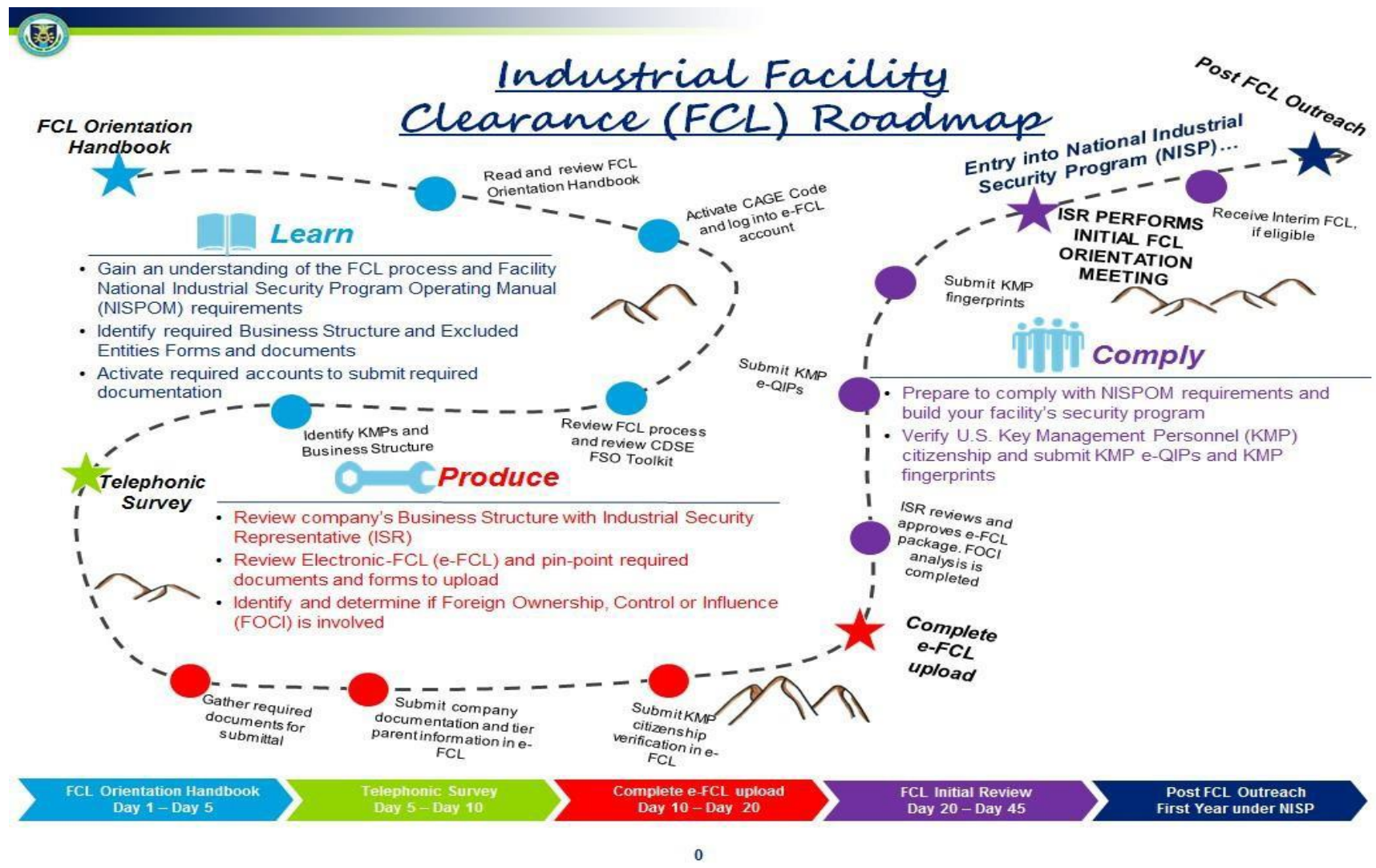
Facilities where KMP do not already possess the level of personnel security clearance required for the FCL may significantly impact the amount of time it takes to issue an FCL since KMP required to be cleared in connection with the FCL will have to go through the investigation and clearance adjudication process.

A facility where Foreign Ownership, Control, or Influence (FOCI) is present will also take a longer time to clear because these facilities must undergo satisfactory FOCI mitigation.

Finally, your facility must not be under FOCI to such a degree that the granting of an FCL would be inconsistent with the national interest.



1.1 FCL Roadmap





2.1 FCL Process Requirements Worksheet

The following table provides a list of the required documents, forms, action items, accounts to activate, training, and discontinuation points throughout the FCL process and first year under the NISP.

Note: Contractor e-FCL Administrator may begin to upload documents and forms into e-FCL once the FCL Orientation Handbook is received on Day 1. ISR will not visit contractor's facility to conduct the initial orientation meeting until all information is uploaded into e-FCL and e-QIPs (if applicable) have been submitted.

	FCL Orientation Handbook & Telephonic Survey	Complete e-FCL upload	FCL Initial Review	Post FCL Initiatives
Timeline	Day 1 – 10	Day 10 – 20	Day 20 - 45	First Year under NISP
Documentation	<input type="checkbox"/> Identify Business Structure (see 3.1) <input type="checkbox"/> Identify Key Management Personnel (KMP) (see 3.1) <input type="checkbox"/> Identify Tier Entities, if applicable (see 3.2)	<input type="checkbox"/> Submit all required e-FCL Documents (see 3.1)	<input type="checkbox"/> Review CDSE Self-Inspection guide	
Forms		<input type="checkbox"/> Submit all required e-FCL Forms (see 3.2)		
Action Items	<input type="checkbox"/> Review FSO Toolkit http://www.cdse.edu/toolkits/fsos/index.php <input type="checkbox"/> Review e-FCL e-FCL User Guide <input type="checkbox"/> Start uploading documentation into e-FCL <input type="checkbox"/> Verify KMP U.S. citizenship <input type="checkbox"/> Review National Industrial Security Program Operating Manual (NISPOM)	<input type="checkbox"/> Submit KMP citizenship verification (current or expired U.S. passport or birth certificate and a government issued photo ID). Provide citizenship documentation on all KMP identified on the facility's KMP list.	<input type="checkbox"/> ISR visits Contractor's Facility after e-FCL is approved and all required KMPs submit e-QIPs <input type="checkbox"/> Provide KMP citizenship verification to ISR during initial orientation meeting <input type="checkbox"/> Submit KMP Electronic Questionnaires for Investigation Processing (e-QIPs) to OPM within 45 days after receipt of the FCL Orientation Handbook (see 5.0) <input type="checkbox"/> Submit KMP fingerprints within 14 days after submitting KMP e-QIPs (see 5.0) <input type="checkbox"/> Prepare to comply with NISPOM requirements <input type="checkbox"/> Prepare to implement a Security Program and insider threat program	<input type="checkbox"/> Comply with NISPOM requirements <input type="checkbox"/> Implement a facility security program and insider threat program aligned to NISPOM requirements



Activate Accounts	<input type="checkbox"/> Apply for a Commercial and Government Entity (CAGE) Code (See 5.0) <input type="checkbox"/> Log-Into e-FCL (See 4.0) e-FCL User Guide			Apply for a Secure Web Fingerprint Transmission (SWFT) account Apply for a JPAS Account
Training		<input type="checkbox"/> Recommend to register and begin FSO and Insider Threat training in CDSE	<input type="checkbox"/> Recommend to register and begin FSO and Insider Threat training in CDSE	<input type="checkbox"/> Complete FSO and Insider Threat training provided by CDSE
Discontinuation Points	<input type="checkbox"/> DSS determines FCL justification is not valid	<input type="checkbox"/> Failure to submit all Documents and Forms into the e-FCL within 20 days after receipt of FCL Orientation Handbook	<input type="checkbox"/> Failure to submit KMP e-QIPs within 45 days after receipt of the FCL Orientation Handbook <input type="checkbox"/> Failure to submit KMP fingerprints within 14 days after submitting KMP e-QIPs	<input type="checkbox"/> Failure to comply with NISPOM requirements or implement a facility security program and insider threat program may result in the invalidation of the facility's FCL



3.0 Business Structure and Excluded Tier Entities

The following section details the required business structure and excluded tier entity forms and documents to submit to the e-FCL.

Discontinuation Point: Failure to submit all forms, business structure documents, and excluded tier entity documents into the e-FCL **within 20 days** after receipt of your FCL Orientation Handbook results in the discontinuation of your Facility's FCL processing.

3.1 Business Structure Required Documents

The following table outlines business records and Personnel Security Clearances (PCLs) for KMPs required by business structure.

Business Structure	Business Records Required	PCLs for KMPs
Sole Proprietorship	<ul style="list-style-type: none"> Business License Fictitious Name Certificate Recent changes to company structure 	<ul style="list-style-type: none"> Owner of sole proprietorship Senior Management Official (SMO) Facility Security Officer (FSO) Insider Threat Program Senior Official (ITPSO)
General Partnership	<ul style="list-style-type: none"> Business License Fictitious Name Certificate Partnership Agreement Legal Organization Chart Board/Company Meeting Meetings* Recent changes to company structure 	<ul style="list-style-type: none"> Senior Management Official (SMO) Facility Security Officer (FSO) Insider Threat Program Senior Official (ITPSO) All General Partners, <i>except</i>: <ul style="list-style-type: none"> Single Partner (must be cleared) Management Committee (all committee members must be cleared)
Limited Partnership	<ul style="list-style-type: none"> Business License Fictitious Name Certificate Partnership Agreement Certificate of Limited Partnership Legal Organization Chart Board/Company Meeting Meetings* Recent changes to company structure 	<ul style="list-style-type: none"> Senior Management Official (SMO) Facility Security Officer (FSO) Insider Threat Program Senior Official (ITPSO) All General Partners, <i>except</i>: <ul style="list-style-type: none"> Single Partner (must be cleared) Management Committee (all committee members must be cleared) Limited Partners need PCL if they work on classified contracts or need access to classified information
Joint Venture (JV)	<ul style="list-style-type: none"> Business License Fictitious Name Certificate JV Agreement Legal Organization Chart Board/Company Meeting Meetings* Recent changes to company structure 	<ul style="list-style-type: none"> Senior Management Official (SMO) Facility Security Officer (FSO) Insider Threat Program Senior Official (ITPSO) JV Partners must be excluded, or cleared if their duties require access to classified information Officials working on JV are cleared if their duties require access to classified information



Business Structure	Business Records Required	PCLs for KMPs
Privately Held Corporation	<ul style="list-style-type: none"> ▪ Business License ▪ Fictitious Name Certificate ▪ Articles of Incorporation ▪ By-Laws ▪ Stock Ledger ▪ Legal Organization Chart ▪ Board/Company Meeting Meetings* ▪ Recent changes to company structure 	<ul style="list-style-type: none"> ▪ Senior Management Official (SMO) ▪ Facility Security Officer (FSO) ▪ Insider Threat Program Senior Official (ITPSO) ▪ Chairman of the Board (COB) ▪ Vice Chair of Board, if provisions for rotating or Pro Tem duties ▪ Corporate Officials are cleared if their duties require access to classified information
Publicly Held Corporation	<ul style="list-style-type: none"> ▪ Business License ▪ Fictitious Name Certificate ▪ Articles of Incorporation ▪ By-Laws ▪ Most recent SEC filings ▪ Legal Organization Chart ▪ Board/Company Meeting Meetings* ▪ Recent changes to company structure 	<ul style="list-style-type: none"> ▪ Senior Management Official (SMO) ▪ Facility Security Officer (FSO) ▪ Insider Threat Program Senior Official (ITPSO) ▪ Chairman of the Board (COB) ▪ Vice Chair of Board, if provisions for rotating or Pro Tem duties ▪ Corporate Officials are cleared if their duties require access to classified information
Limited Liability Company	<ul style="list-style-type: none"> ▪ Business License ▪ Fictitious Name Certificate ▪ Certificate of Formation or Articles of Organization ▪ Legal Organization Chart ▪ Operating Agreement ▪ LLC Meeting Meetings* ▪ Recent changes to company structure 	<ul style="list-style-type: none"> ▪ Senior Management Official (SMO) ▪ Facility Security Officer (FSO) ▪ Insider Threat Program Senior Official (ITPSO) ▪ LLC Members are cleared if their duties require access to classified information ▪ Managers
College/University	<ul style="list-style-type: none"> ▪ Charter ▪ Board/University Meeting Meetings* ▪ Legal Organization Chart ▪ Recent changes to university structure 	<ul style="list-style-type: none"> ▪ Senior Management Official (SMO) ▪ Facility Security Officer (FSO) ▪ Insider Threat Program Senior Official (ITPSO) ▪ President ▪ Regents/Trustees/Directors are cleared if their duties require access to classified information

*Include the most recent Meeting Minutes and any Meeting Minutes to reflect changes to a company's address, name, KMPs, etc.

** If business structure is not identified, discuss with DSS during the telephonic survey

Legal Organization Chart (Company Structure Org Chart in e-FCL) must be submitted when the entity is owned by another legal entity. It shall reflect all U.S. and foreign parent companies including their affiliates. The Legal Organization Chart shall identify the associations between the cleared facilities and the ultimate parents, including the percentages of ownership, FCL status, CAGE codes and other helpful information explaining the relationship among the companies in the chain of ownership.

Excluded KMPs: DSS will determine which Officers and Directors of the company not accessing classified information are considered excluded, and do not need a PCL or have a need to access lower than the FCL to be granted. The company must submit exclusion resolutions for these Officers and Directors ([see Appendix C](#)).

If Key Management Personnel are cleared for contractual performance reasons and not in connection with the FCL then this difference needs to be identified.



3.2 Required Forms

The following outlines the Forms required for upload into the e-FCL.

Forms	To Include on Forms
SF-328; Certificate Pertaining to Foreign Interests	<ul style="list-style-type: none"> ▪ Certificate pertaining to a company's foreign interests ▪ Execute one original SF328 form ▪ SF328 must be signed by an employee or representative of the company who has actual authority to execute agreements with the U.S. Government on behalf of the company ▪ Upload a signed SF328 form. The form must be generated from the e-FCL system itself. An SF328 from any other sources will not be accepted. ▪ Provide all supplemental responses to affirmative SF328 questions (see supplemental data sheets in e-FCL)
Summary Data Sheet	<ul style="list-style-type: none"> ▪ List company website if there is one ▪ Include stock information ▪ List all previous business names ▪ List all Tiered Parents ▪ Match number of Directors in Articles of Organization to Company Bylaws ▪ List all addresses dating back 10 years ▪ Current Chairman of the Board
Key Management Personnel (KMP) Form	<ul style="list-style-type: none"> ▪ Spell out entire KMP full names ▪ Social Security Number not required for excluded KMPs ▪ Citizenship of all personnel listed as required to be cleared ▪ KMPs must match the Articles of Organization, by-laws or amendments
Tiered Parent List If applicable	<ul style="list-style-type: none"> ▪ List of all Parent Companies (see 3.3)
DD Form 441	<ul style="list-style-type: none"> ▪ Agreement between your organization and the United States Government that details the security responsibilities of both the cleared organization and the United States Government ▪ Execute (but do not date) two original DD441 forms for DSS and contractor retention ▪ DD441 must be signed by an employee or representative of the company who has actual authority to execute agreements with the U.S. Government on behalf of the company. Do not date. DSS will date the DD441 forms upon countersigning. ▪ Upload a signed DD441 into e-FCL for place holder
DD Form 441-1 If applicable	<ul style="list-style-type: none"> ▪ Attachment to the DD Form 441 listing cleared divisions or branch offices that are included in and covered by the provisions of the organization's Security Agreement and Certificate Pertaining to Foreign Interest

3.2.1 Required e-FCL Forms Signatures per Business Structure

The following guidelines provide information to sign the DD441, DD441-1 and SF328 forms according to your company's Business Structure.

Business Structure	Business Structure
Sole Proprietorship	<ul style="list-style-type: none"> ▪ Sole proprietor will execute the DD 441/ SF328. ▪ "Certification" section of DD 441/ SF328 will not be executed, but one witness must sign these forms
General Partnership	<ul style="list-style-type: none"> ▪ All general partners will execute DD 441/ SF328 ▪ One witness signature is required
Limited Partnership	<ul style="list-style-type: none"> ▪ One witness signature is required



BusinessStructure	BusinessStructure
Joint Venture¹	<ul style="list-style-type: none">▪ DD 441/ SF328 forms must be executed by an authorized representative of one the contractor participants performing on the classified contract
Privately Held Corporation	<ul style="list-style-type: none">▪ Authorized management personnel may execute the DD441/ SF328 forms▪ Witness is not required
Publicly Held Corporation	<ul style="list-style-type: none">▪ Authorized management personnel may execute the DD441/ SF328 forms▪ Witness is not required
Limited Liability Company (LLC)	<ul style="list-style-type: none">▪ LLC member or authorized manager may execute the DD 441/ SF328 forms▪ Two witnesses must sign the DD 441 and SF328▪ Certification, at bottom, does not need to be completed

¹The business will be processed for an FCL in accordance with the procedures that apply to it as a corporation, partnership, or LLC. For example, if the joint venture documentation shows that the JV is a partnership, the JV should be processed for an FCL as a partnership. Therefore, one witness signature is required. For example, if the joint venture documentation shows that the JV is a LLC, the JV should be processed for an FCL as a LLC. Therefore, two witness signatures is required.

If only one officer exists within your organization then work with your assigned ISR to determine how the forms must be certified.



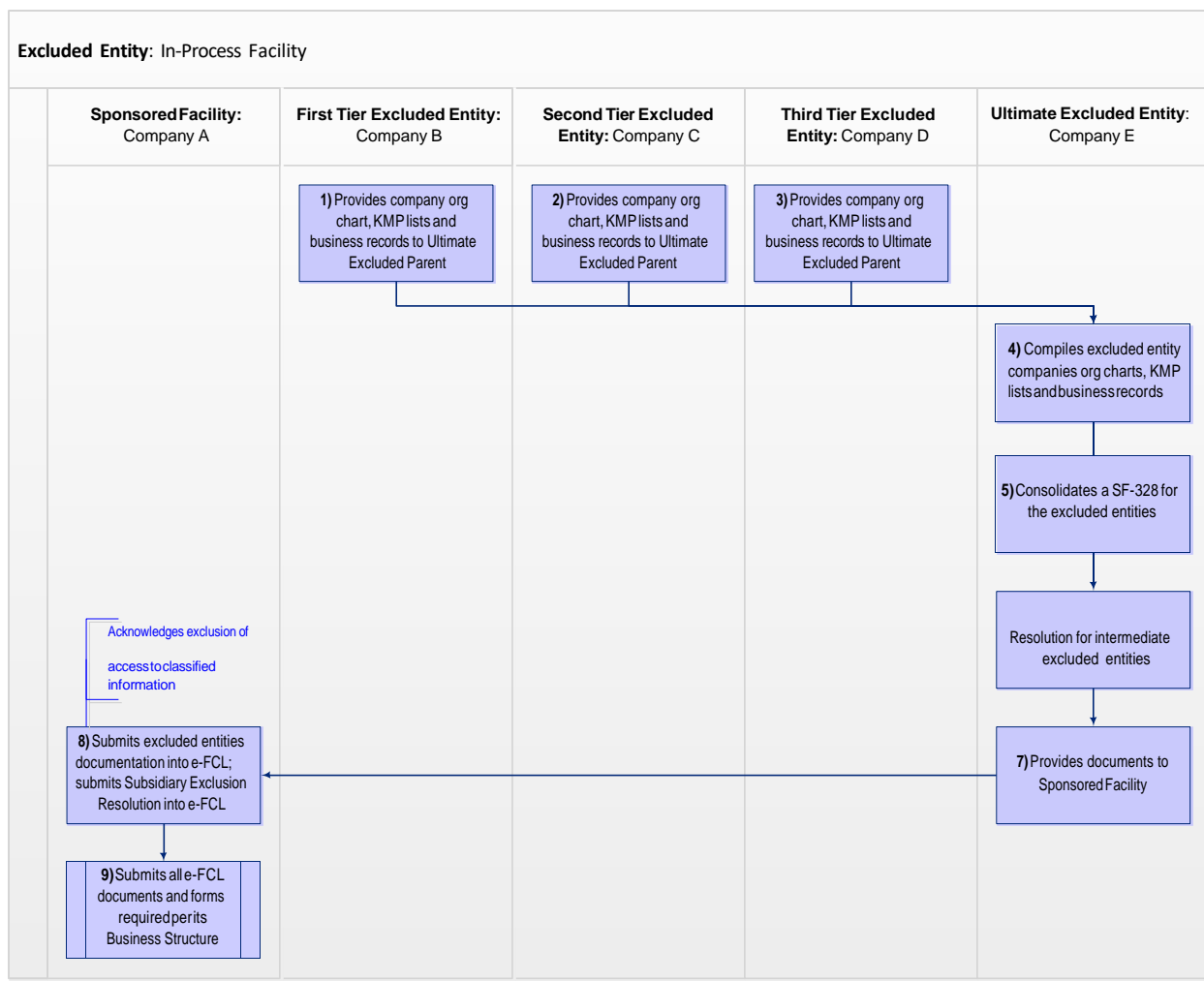
3.3 Excluded Tier Entity Process

The objective of this process is to clear the sponsored facility and identify tiered companies to exclude from access to classified information. A tiered company, also known as a parent company, is defined as a company owning at least a majority of another company's voting securities. DSS determines if tiered companies are required to obtain an FCL or can be excluded from access to classified information. If a tiered company needs to be cleared, it will also be placed in process and cleared concurrently with the company that was awarded the contract.

3.3.1 Excluded Tier Entity Requirements

The process flow below outlines the required documents the sponsored facility must provide to DSS on behalf of any intermediate excluded entities and the ultimate excluded entity. In this process neither the ultimate excluded entity nor any of the intermediate tiered entities hold a FCL.

3.2.1.1 Process Flow



3.3.1.2 Entity Roles and Responsibilities

Entity	Responsibility
Intermediate Parent/Owner Entity	<ul style="list-style-type: none">Submits Company's Organization Chart, KMP List, and Business Records to Ultimate Cleared Entity

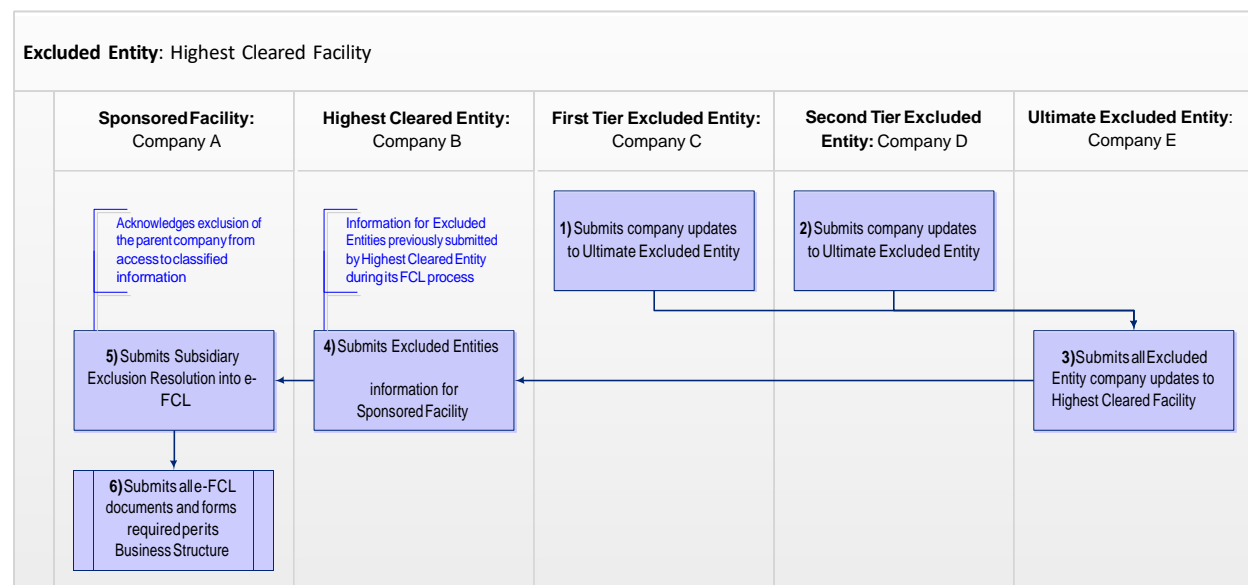


Entity	Responsibility
Ultimate Parent/Owner Entity	<ul style="list-style-type: none"> Provides all Entities Organization Charts, KMP Lists, and Business Records to Sponsored Facility Provides Sponsored Facility the requested Exclusion Resolution on behalf of its company and Intermediate parents to be Excluded
Sponsored Facility (Highest Cleared Facility)	<ul style="list-style-type: none"> Submits Parent entities to be Excluded Organization Charts, KMP Lists, Business Records, and Exclusion Resolution for entities Submits Subsidiary Exclusion Resolution acknowledgement Submits all required e-FCL Forms and Documents per its Business Structure

3.3.2 Highest Cleared Tier Entity

The process flow below documents the required documents the Sponsored Facility and Highest Cleared Entity must provide to DSS on behalf of any Intermediate Excluded Entities and the Ultimate Excluded Entity. In this process the Highest Cleared Entity holds a FCL and provides DSS updates on behalf of the Ultimate Excluded Entity and Intermediate Tier Entities. Highest Cleared Entity previously submitted all required Documents and Forms for Excluded Entities during its FCL process.

3.2.2.1 Process Flow



3.3.2.2 Entity Roles and Responsibilities

Entity	Responsibility
Intermediate Entity	<ul style="list-style-type: none"> Submit changes to Ultimate Entity, if applicable
Ultimate Entity	<ul style="list-style-type: none"> Provides Intermediate Entity changes to Highest Cleared Entity, if applicable
Highest Cleared Entity	<ul style="list-style-type: none"> Provides Entity changes to DSS, if applicable
Sponsored Facility	<ul style="list-style-type: none"> Submits all required e-FCL Forms and Documents per its Business Structure Submits Subsidiary Acknowledgement of Exclusion Resolution



4.0 e-FCL Process

The e-FCL is a web based system to submit company data in an electronic format for facility clearance vetting and FOCI mitigation. e-FCL submission site URL: <https://submission.dssfcl.anl.gov>. Your account will have been registered by the Facility Clearance Branch (FCB) as part of the facility being placed in process for an FCL. The company designates a representative, usually the FSO, as the e-FCL Administrator. Below outlines the e-FCL process steps:



4.1 Logging into e-FCL

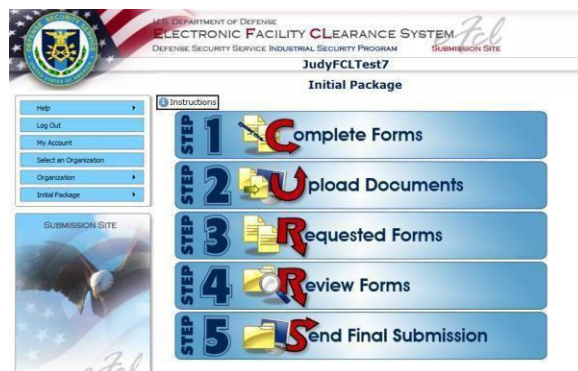
Prior to Logging-In: It is recommended that you download the e-FCL “Submission Site User Guide” to gain a better understanding of the system, how to log-in the first time, and the required documents and forms to upload into the system.

First Time Log-In: The log-in requires a User ID and Password. The initial User ID is the e-mail address entered when the User was registered by DSS or by the company’s e-FCL Administrator. The temporary password was sent to the e-mail address entered when the User was registered by the DSS or by the company’s e-FCL Administrator. First time log-in also requires the e-FCL Administrator to enter the Company’s Organization Type and Organization’s Employer Identification (EIN) Tax ID or SSN. The e-FCL automatically generates the forms required by Organization Type as well as a list of required document uploads.

4.2 e-FCL in 5 Steps

The e-FCL Submission Site provides Users with an easy five step process for completing and submitting e-FCL submission packages. The package consists of all of the forms and attachments required for a facility clearance submission. The user can navigate between steps as needed and enter or exit the package as many times as needed before sending the final submission.

Below provides a list of the five steps and the required forms and documents to submit into the e-FCL. All potential forms and documents are listed under [A.1](#) this document.



Step #	e-FCL Submission Step	e-FCL Submission Description
1	Complete Forms	Electronic copies of all required forms are provided for completion based on the type of contractor organization
2	Upload Documents	Uploads are requested of key business documents. Also review required documents per your company’s business structure
3	Requested Forms	Forms requested by DSS for FOCI Mitigation are stored here, this step will be empty the first time an Initial Package is submitted
4	Review Forms	After reviewing all documents and uploads, the system checks to ensure that all forms and uploads have been completed and displays those that still need to be completed
5	Send Final Submission	Final submission, once the package is submitted the contractor cannot edit the package unless DSS “unlocks” it



5.0 Accounts and Systems

The table below outlines the Accounts and Systems the FSO must activate or leverage to submit additional documents for its Facility to receive its FCL and to maintain a compliant security program after obtaining the FCL.

Discontinuation Point: Failure to submit all KMP e-QIPs **within 45 days** after receipt of the FCL Orientation Handbook results in the discontinuation of your Facility's FCL. Failure to submit KMP fingerprints **within 14 days** after submitting KMP e-QIPS results in the discontinuation of your Facility's FCL.

Accounts	Reason for Account	Description	Links
Commercial and Government Entity (CAGE) Code	Provides a standardized method to identify your specific facility	The CAGE Code is a five-character ID number used extensively within the federal government, assigned by the Department of Defense's Defense Logistics Agency (DLA). It tracks basic facility information. If your company does not already have a CAGE Code for the facility requiring clearance, one may be obtained by visiting System for Award Management (SAM).	SAM
Joint Personnel Adjudication System (JPAS)*	System to support adjudication process. (Account created after Facility is issued its FCL.)	JPAS standardizes the adjudication process within DoD, and provides a database and processes within the security manager realm of functions. It allows communication between the central adjudication facility (CAF) and the security personnel in the field who actually give cleared individuals access to classified information. For JPAS access, submit DMDC's new Personnel Security System Access Request (PSSAR) form to the DMDC Contact Center for processing A Public Key Infrastructure (PKI) is required for JPAS. Please see link	JPAS PKI
Electronic Questionnaires for Investigations Processing (e-QIP)*	Submit KMP information through this system as part of the PCL process	e-QIP allows the user to electronically enter, update and transmit their personal investigative data over a secure internet connection to a requesting agency	e-QIP
Industrial Security Facilities Database (ISFD)	Provides FCL and Safeguarding status for prime and subcontractors	Web enabled database that maintains FCL related information	No Link Available



Accounts	Reason for Account	Description	Links
Secure Web Fingerprint Transmission (SWFT)*	Submit KMP fingerprints through SWFT or third party vendor to complete KMP's PCL process (Account created after Facility is issued its FCL.)	SWFT allows the submission of fingerprints to be uploaded electronically through its system. (All fingerprint images that are provided in support of background investigations must be captured and submitted electronically) <i>For SWFT access, submit DMDC's new Personnel Security System Access Request (PSSAR) form to the DMDC Contact Center for processing</i>	SWFT
Security Training, Education and Professionalization (STEPP)	Provides courses for Contractor's security professionals	Program maintaining the list of courses DSS provides to a contractor's security professionals. The courses are intended for use by Department of Defense and other U.S. Government personnel and contractors within the National Industrial Security Program.	STEPP

* For support on e-QIP, JPAS, or SWFT please contact Defense Manpower Data Center (DMDC) at 1-800-467-5526 or dmdc.contactcenter@mail.mil



6.0 Telephonic and FCL Initial Review Preparation

6.1 Telephonic Survey Preparation

A telephonic survey will be conducted by a DSS representative within 10 days of the facility being placed in process. In preparation for the upcoming telephonic survey please be prepared to discuss and ask questions on the following topics:

- Company business structure and required documents and forms
- KMP List; KMPs requiring PCLs and Excluded KMPs
- Tier Entity/Excluded Parent process and required documentation
- e-FCL submission process
- e-QIP submission process
- CAGE Code account
- SWFT account
- Review the FSO Toolkit <http://www.cdse.edu/toolkits/fsos/index.php>

6.2 FCL Initial Orientation Meeting

The FCL initial orientation meeting is conducted by a special agent assigned from the local field office. Please be prepared to discuss the following topics with the ISR during their on-site visit to the facility:

- Company's NISPOM requirements
- Facility's Security Program
- Facility's Insider Threat Program
- Provide KMP U.S. citizenship verification (current or expired passport or a birth certificate, and government issued photo ID)



Appendix A: Requirements

The following are the required documents, forms, accounts, and training an FSO will need to submit or complete prior to the discontinuation point for its facility to receive a FCL.

A.1 Required e-FCL Forms and Documents

The table below lists the documents that are always required in the e-FCL, those required for a particular business structure, and those required only if DSS uploads files into the e-FCL folder designated as “Shared Files”, which can be viewed by both the Company and DSS personnel. NO CLASSIFIED DOCUMENTS CAN BE UPLOADED INTO THE E-FCL SYSTEM.

Document	Always Required	Business Structure Requirement	Shared File Requirement
Articles of Organization/Incorporation	✓		
Operating Agreement/By-laws	✓		
DD-254	✓		
DD-441/DD-441-1	✓		
Excluded Parent Documents			✓
Miscellaneous Documents			✓
Shared DSS Files			✓
Cover Letter			✓
Technology Control Plan			✓
Electronic Control Plan			✓
Articles of Incorporation		<ul style="list-style-type: none"> ▪ Privately Held Corporation ▪ Publicly Held Corporation 	
Business License		<ul style="list-style-type: none"> ▪ Sole Proprietorship ▪ General Partnership ▪ Limited Partnership ▪ Joint Venture ▪ Privately Held Corporation ▪ Publicly Held Corporation ▪ Limited Liability Company 	
Bylaws		<ul style="list-style-type: none"> ▪ Privately Held Corporation ▪ Publicly Held Corporation 	
Fictitious Name Certificate (Doing Business As)		<ul style="list-style-type: none"> ▪ Sole Proprietorship ▪ General Partnership ▪ Limited Partnership ▪ Joint Venture ▪ Privately Held Corporation ▪ Publicly Held Corporation ▪ Limited Liability Company 	
Partnership Agreement		<ul style="list-style-type: none"> ▪ General Partnership ▪ Limited Partnership 	
Joint Venture Agreement		<ul style="list-style-type: none"> ▪ Joint Venture 	



Document	Always Required	Business Structure Requirement	Shared File Requirement
Stock Ledger		<ul style="list-style-type: none"> Privately Held Corporation Publicly Held Corporation 	
Organization chart		<ul style="list-style-type: none"> General Proprietorship Limited Partnership Joint Venture Privately Held Corporation Publicly Held Corporation Limited Liability Company 	
Charter		<ul style="list-style-type: none"> College/University 	

A.2 Required KMP PCLs

KMP	Business Structure
SMO	<ul style="list-style-type: none"> All Business Structures
FSO	<ul style="list-style-type: none"> All Business Structures
ITPSO	<ul style="list-style-type: none"> All Business Structures
General Partners	<ul style="list-style-type: none"> General Partnership Limited Partnership
Limited Partners	<ul style="list-style-type: none"> Limited Partnership
JV Partners	<ul style="list-style-type: none"> Joint Venture
Chairman of the Board	<ul style="list-style-type: none"> Privately Held Corporation Publicly Held Corporation
Corporate Officials	<ul style="list-style-type: none"> Privately Held Corporation Publicly Held Corporation Joint Venture
Regents/Trustees/Directors	<ul style="list-style-type: none"> College/University, Company, Corporation
Chief Executive Officer (CEO)	<ul style="list-style-type: none"> College/University, Company, Corporation, Partnership, Sole Proprietorship
Managing Member / Member	<ul style="list-style-type: none"> Limited Liability Corporation

A.3 Defining KMP Authorities of Position

Please note that the descriptions of the Authorities of the Position are general and do not include all characteristics for each position. Roles may differ per your company.

KMP Role	Authorities of the Position
CEO	<ul style="list-style-type: none"> Highest ranking executive manager in a corporation or organization's by-laws or organizational documents Responsible for the overall success/management of the organization Ultimate authority to make final decisions for an organization Responsibility for creating, planning, implementing, and integrating the strategic direction/vision of an organization Reports to a Board of Directors and serves at the discretion of the Board of Directors



KMP Role	Authorities of the Position
President	<ul style="list-style-type: none">Creates, communicates, and implements the organization's vision, mission, and overall directionLeads, guides, directs, and evaluates the work of other executive leaders including senior vice presidents, vice presidents and directorsFormulates and implements the strategic plan that guides the direction of the businessOversees the organization in accordance with the direction established in the strategic plans
Chairman of the Board	<ul style="list-style-type: none">Trusted with the responsibility of chairing a board or organizationGoverns the board according to the bylaws of the organization. The chairman must attend the board meetings and committees regularly.Committed to board duties and has vast knowledge of the organization itselfEvaluates annual performance of the organizationChairman rarely involves themselves in the company's day-to-day operations, instead concentrating on the bigger picture and various strategies to increase the company's bottom lineInstitutes company policies and guidelines, and make certain that they are carried out via upper managementRecruits, interviews, and hires the CEOVotes on key issues surrounding the company; when board is at a standstill on an issue, the chair makes the final decision
Manager	<ul style="list-style-type: none">For an LLC, only a manager or authorized officer can bind the LLC as specified in the Operating Agreement or when there is no operating agreement, State Law where LLC is formedElected by the membersDecision authority on key policies, transactions, and establishment of guidelines for how the LLC will operateCan appoint officers to serve at the pleasure of the manager
General Partner	<ul style="list-style-type: none">Full management control and also accepts full personal responsibility for partnership liabilities as specified by state law where the partnership was formed and the partnership agreementRight to manage the business, conduct transactions on the behalf of the business, and are liable for the business' debtsCommonly is active in the day-to-day operations of the businessMay be an individual or company
Shareholder	<ul style="list-style-type: none">Makes a financial investment in the corporation, which entitles those with voting shares to elect the directors as specified in the Shareholders agreement and/or state lawDoes not normally have any rights to be involved directly in company managementConnection to company management is typically via the Board of DirectorsIf shareholder is not satisfied with the performance of the directors, they may remove the directors or refuse to re-elect them



KMP Role	Authorities of the Position
Board of Directors	<ul style="list-style-type: none"> Protects shareholders' assets and ensure they receive a decent return on investment Provides oversight and strategic direction on behalf of the shareholders as authorized in the by-laws or State law Monitors corporate governance within an organization Approves financial statements Selects and evaluates CEO; approves appropriate compensation for CEO Evaluates attractiveness of and pay dividends Oversees share repurchase programs, recommend stock splits, etc. Recommends or discourages mergers and acquisitions
Vice President	<ul style="list-style-type: none"> Second in command in an organization and has specific responsibilities depending on the needs of his or her organization as directed by the by-laws Assists in formulating and implementing the strategic plan that guides the direction of the business or their area of responsibility Leads, guides, directs, and evaluates the work of other executive leaders including assistant vice presidents, directors, and managers Achieves the organization's overall strategic goals and profitability requirements as determined by the strategic plans Assists creating, communicating, and implementing the organization's vision, mission, and overall direction In the President's absence, the Vice President acts in the role
Chief Operating Officer (COO)	<ul style="list-style-type: none"> Responsible for the daily operations. Provides communication, leadership, and guides management as necessary to ensure that company has the proper operational controls, administrative and reporting procedures in place to effectively grow the organization Ensures effective communication with the President/CEO by keeping him/her informed of daily operations Ensures that operating objectives and standards of performance are understood by management and employees Ensures that Company complies with all applicable legal and regulatory requirements and, where appropriate, best practice to maximize the financial integrity of Company Ensures appropriate and satisfactory systems are in place for monitoring Company performance against planned and budgeted expectations
Limited Partner	<ul style="list-style-type: none"> Generally does not have any kind of management responsibility. They are not material participants, strictly investors Share in profits and losses based on share of ownership
Member	<p>Similar to a stockholder in a corporation. Responsible for formation of the LLC and/or having owning interest in the LLC as designated in the Operating Agreement and/or State Law when there is no Operating Agreement</p> <ul style="list-style-type: none"> Chooses a manager to manage the LLC Can also be the manager

A.4 Training

Training Classes	Link
FSO Initial Training	http://www.cdse.edu/toolkits/fsos/new-fso.html



Appendix B: e-FCL FAQs

Question	Answer
How do I set up an e-FCL account?	The DSS Facility Clearance Branch registers all companies in the process of obtaining a new facility clearance for an e-FCL account. The account is issued to the company's Facility Security Officer (FSO).
Is the FSO the only person at the company who can have an account and password? If so, what happens if a change takes place with the company when the FSO is on leave?	Upon registration, the FSO is typically designated as the User Administrator and account holder. The FSO can create additional accounts under the Organization tab allowing others access to their information. If an FSO unexpectedly leaves without providing access to the account, please contact your assigned ISR.
Do I need to keep a copy of the SF 328 even though I uploaded an electronic copy into the e-FCL system?	Even though the signed and sealed copy of the SF 328 is uploaded in the system, you must keep the original document for viewing by the ISR upon request.
How long will my account be valid for?	Your account is valid until such time as you no longer hold a facility clearance.
Because of the social security information on the KMP lists, is information transmitted and stored in a secure manner?	The e-FCL system meets government standards for the protection of proprietary and personal information.
I uploaded an incorrect file in the system. Can I delete the file?	Yes, you can delete and replace any uploaded file as long as the package is "unlocked" by DSS. To complete this action, follow these steps: <ul style="list-style-type: none">▪ Right click on the uploaded document.▪ Then perform one of the following actions: View (allows the user to view the document) Replace (allows the user to replace whatever the document is with a new one) Delete (allows the user to delete the document)
Can a Home Office of a Multi-facility Organization see subsidiary e-FCL account information?	Yes, if the subsidiary e-FCL user administrator establishes a secondary 'user account' for the home office user under their CAGE Code. To accomplish this, the subsidiary user administrator must go into the "Organization" tab on the left hand of the page, then choose "Users", then "Add a New User." If the new user already has an existing e-FCL account, the next time they log into e-FCL they will see the multiple organizations listed for viewing (as long as the same email address is used for all accounts).
Do I need to upload DoD Contract Security Classification Specification DD Form 254s in e-FCL?	DSS requests that you include copies of DD -254s under the DD -254 tab within the Upload Documents section of the e-FCL system.
Is there a file size limit to attachments in the system?	Yes, 5MB per individual file.
Is there a way to make my files smaller to meet the 5MB size upload limit?	Yes, if you have Adobe Acrobat Professional you can reduce the size of a file.



Question	Answer
What if reducing the size of a file still doesn't make it less than 5MB in size?	You will then have to split apart the document and upload it in sections that are 5MB and under in size.
Where do I register for an account?	Companies that are currently cleared or which are a U.S. Excluded Parent who require an e-FCL account to report a changed condition should contact their ISR who can register them for an account. Companies who are in-process for a clearance will be contacted directly by the Facilities Clearance Branch who will register them for an account.
As a currently cleared facility, do I need to complete a full package in order to just report a changed condition?	All companies, existing and in-process must complete an "initial package." An initial package requires that an electronic version of the SF-328 and KMP lists be completed. Corporate documents must be uploaded as well. Once this initial package is completed, all your documentation is retained in the system and future changed conditions are quick and easy to report.
As an existing cleared company do I really need to complete a new SF-328 since my information has not changed?	The e-FCL system requires that an electronic SF-328 form be completed, printed and a hard copy of it uploaded with signatures. However, if your SF328 information has not changed, once you have completed the electronic copy, you can upload into the system a copy of your existing SF-328. The same principle applies to the KMP list.
My facility falls under a consolidated SF-328 from our home office. Does the system require that I complete the electronic SF-328 and upload a signed hard copy as well?	No, if you fall under a consolidated SF-328, within Step 1 of the system, you can check a box which states that you fall under a consolidated SF-328. Once that box is checked, you will not be required to complete the electronic copy, nor will you be asked to upload one in the system. .



Appendix C: Exclusion Resolutions

C.1 Highest Cleared Entity Noting Excluded Entity's Exclusion and Resolution to Exclude Parent Organization

I, *(Insert Full Name)*, the duly elected Secretary of *(Insert Name of Highest Cleared Entity)*, a corporation in the State of *(Insert Name of State)*, do hereby certify that the following is a true and complete copy of a resolution passed at a meeting of the Board of Directors of said Corporation, at which a quorum was present, duly called, and held *(Insert Month Day, Year)*.

BE IT RESOLVED that officials of *(Insert Name of Highest Tier Excluded Entity and any Intermediate Entities)*, the ultimate tier entity organization, or any of the intermediate tier entities of *(Insert Name and Address of Highest Cleared Entity)*, shall not require and shall not have access to classified information in the custody of *(Insert Name of Highest Cleared Entity)*, a subsidiary organization or any other facilities reporting to *(Insert Name of Highest Cleared Entity)* that require access to classified information.

BE IT FURTHER RESOLVED that *(Insert Name of Highest Cleared Entity)* hereby acknowledges the execution of a resolution by *(Insert Name and Address of Highest Excluded Entity)* whereby the Corporation, its officers and directors, as such, and intermediate entities will not require and will not have access to classified information in the custody of *(Insert Name of Highest Cleared Entity)*, a subsidiary corporation, and further that this action will not affect adversely the policies of said subsidiary involving the security and safeguarding of classified information or performance of classified contracts.

BE IT FURTHER RESOLVED that these actions of the Board of Directors of the *(Insert Name of Highest Cleared Entity)* are taken for the purpose of exempting the *(Insert Name of Highest Tier Excluded Entity and Intermediate Tiers)* from the necessity of being processed for a Facility Security Clearance equivalent to that held by the *(Insert Name of Highest Cleared Entity)* in conformity with the "National Industrial Security Program Operating Manual."

IN WITNESS WHEREOF I have hereunto set my hand and affixed the seal of *(Insert Name of Highest Cleared Entity)* this *(Insert Date)*.

Signature

Note: Two copies shall be furnished to the local DSS Industrial Security field office with an original signature and corporate seal on each. One copy shall be furnished to the subsidiary. Both the highest tiered excluded entity and the highest cleared subsidiary must execute a "Certificate Pertaining to Foreign Interest" (SF 328).

If the parent is to be excluded from a higher category of classified information, the next to last paragraph should read "... from the necessity of having to be processed for a Facility Security Clearance equivalent to that held by the (Name of Subsidiary)."



C.2 Exclusion Resolution of Corporate Organization

I, *(Insert Full Name)*, the duly elected Secretary of *(Insert Name of Highest Tier Excluded Entity)*, a corporation organized in the State of *(Insert Name of State)*, located at *(Insert Address of Highest Tier Excluded Entity)* do hereby certify that the following is a true and complete copy of a resolution passed at a meeting of the Board of Directors of said Corporation, at which a quorum was present, duly called and held *(Insert Month Day, Year)*.

BE IT RESOLVED that *(Insert Name and Address of Highest Tier Excluded Entity and Intermediate Entities)*, its officers and directors, as such, will not require and will not have access to classified information in the custody of *(Insert Name of Highest Cleared Entity)*, or any other facilities reporting to *(Insert Name of Highest Cleared Entity)* that require access to classified information, and further that *(Insert Name of Highest Cleared Entity)*, has been delegated full authority to act completely independent of *(Insert Name of Highest Tier Excluded Entity and intermediate tiers)* in all matters that involve or relate to *(Insert Highest Cleared Entity's)* responsibility to perform on classified contracts, to include safeguarding classified information.

BE IT FURTHER RESOLVED that this action is taken for the purpose of exempting *(Insert Name of Highest Tier Excluded Entity and Intermediate Tiers)* from the necessity of being processed for a Facility Security Clearance (FCL) in conformity with the "National Industrial Security Program Operating Manual (NISPOM)." In lieu of a Facility Security Clearance, *(Insert Name of Highest Tier Excluded Entity)* will report any changed conditions, as defined in NISPOM 2-102, within the complete organizational structure that may impact the FCL eligibility of *(Insert Name of Highest Cleared Facility)*. Any changes that may impact FCL eligibility of *(Insert Name of Highest Cleared Facility)* will be disclosed to the Facility Security Officer at *(Insert Name of Highest Cleared Facility)* or in special circumstances, directly to the Defense Security Service.

IN WITNESS WHEREOF I have hereunto set my hand and affixed the seal of *(Insert Name of Company)* this *(Insert Date)*.

Signature



C.3 Exclusion Resolution for LLC Member (Organization)

I, *(Insert Full Name)*, the duly elected *(Management Official Title)* of *(Insert Name of LLC Member)*, a *(Type of Organization)* organized in the State of *(Insert Name of State)*, located at *(Insert Address of LLC Member)* do hereby certify that the following is a true and complete copy of a resolution passed at a meeting of the *(Type of Management Board)* of *(Management Officials)* of said *(Type of Organization)*, at which a quorum was present, duly called and held *(Insert Month Day, Year)*.

BE IT RESOLVED that *(Insert Name and Address of LLC Member)*, its management officials, as such, will not require, shall not have, and can be effectively and formally excluded from access to classified information disclosed to *(Insert Name of subject LLC)*, a *Limited Liability Company*, and further that *(Insert Name of subject LLC)*, has been delegated full authority to act completely independent of *(Insert Name of LLC Member)* in all matters that involve or relate to *(Insert Name of subject LLC)*'s responsibility to safeguard information.

BE IT FURTHER RESOLVED that *(Insert Name and Address of LLC Member)*, is taken for the purpose of exempting the *(Insert Name of LLC Member)* from the necessity of being processed for a Facility Security Clearance in conformity with the "National Industrial Security Program Operating Manual."

Signature _____

Date _____

(Senior Management Official of LLC Member)



C.4 Exclusion Resolution for Certain Directors, Officers, and LLC Member (if Person)

I, *(Insert Full Name)*, do hereby certify that I am *(Identify eligible KMP officer/position title)* of *(Insert Name of Corporation)*, a *(Insert Corporation, Company)* organized and existing under the laws of the State of *(Insert Name of State)*, and that the following is a true and correct copy of a resolution adopted by the Board of Directors, management board, or a similar type of executive body of the said *(Insert Corporation, Company)* at a meeting held at *(Insert Location)* on *(Insert Month, Day, Year)* at which time a quorum was present.

WHEREAS, current Department of Defense Regulations contain a provision making it mandatory that the Chairman of the Board, Senior Management Official and Facility Security Officer meet the requirements for eligibility for access to classified information established for a contractor facility security clearance; and

WHEREAS, said Department of Defense Regulations permit the exclusion from the personnel of the requirements for access to classified information of certain members of the Board of Directors and other officers, provided that this action is recorded in the corporate minutes.

NOW THEREFORE BE IT DECLARED that the Chairman of the Board, Senior Management Official and Facility Security Officer at the present time do possess, or will be processed for, the required eligibility for access to classified information; and

BE IT RESOLVED that in the future, when any individual enters upon any duties as Chairman of the Board, Senior Management Official and Facility Security Officer, such individual shall immediately make application for the required eligibility for access to classified information; and

BE IT RESOLVED AND DIRECTED that the following members of the Board of Directors and other officers or members shall not require, shall not have, and can be effectively and formally excluded from access to all **CLASSIFIED** information disclosed to the corporation/company and shall not affect adversely corporate/company policies or practices in the performance of classified contracts for the Department of Defense or the Government contracting activities (User Agencies) of the National Industrial Security Program.

NAME	TITLE

IN WITNESS WHEREOF I have hereunto set my hand and affixed the seal of *(Insert Name of Company)* this *(Insert Day/Month of Year)*.

Signature

Note: Two copies shall be furnished to the local DSS Industrial Security field office with an original signature and corporate seal on each. One copy shall be furnished to the subsidiary. Both the highest excluded entity parent and highest cleared subsidiary must execute a "Certificate Pertaining to Foreign Interest" (SF 328).



Appendix D: Glossary

D.1 Terms

Roles	Responsibilities
Center for Development of Security Excellence (CDSE)	<ul style="list-style-type: none"> Provides the DoD with a security center of excellence for the professionalization of the security community and be the premier provider of security education and training for the DoD and industry under the National Industrial Security Program (NISP)
Commercial and Government Entity (CAGE) Code	<ul style="list-style-type: none"> Five-character ID number used extensively within the federal government, assigned by the Department of Defense's Defense Logistics Agency (DLA). It tracks basic facility information
Contractor	<ul style="list-style-type: none"> Provides cleared government support to a Prime Contractor and/or a GCA
Defense Security Service (DSS)	<ul style="list-style-type: none"> Provides security oversight of the 14,000 facilities performing on classified contract work for US federal agencies within the NISP
Discontinuation Point	<ul style="list-style-type: none"> Facility failure to meet submission deadlines results in the termination of continuing with the facility's FCL process
Electronic Facility Clearance System (e-FCL)	<ul style="list-style-type: none"> Online system utilized by Contractor's Facility administrator to upload Documents and Forms for the FCL process
Electronic Questionnaires for Investigations Processing (e-QIP)	<ul style="list-style-type: none"> System managed by the US Office of Personnel Management (OPM) that automates the common security questionnaires used to process federal background investigations
Facility Clearance Branch (FCB)	<ul style="list-style-type: none"> Administers and oversees the approval or rejection process of a Sponsored Facility's FCL
Facility Security Clearance (FCL)	<ul style="list-style-type: none"> Issued by DSS, allowing a company to perform cleared government contract work on behalf of a GCA or another contractor
Facility Security Officer (FSO)	<ul style="list-style-type: none"> Provides operational oversight of a cleared Facility's compliance with the requirements of the National Industrial Security Program (NISP) Acts as Facility's senior security officer
Industrial Security Representative (ISR)	<ul style="list-style-type: none"> Focuses efforts on assisting Contractor to identify and mitigate processes, people, or systems posing the greatest risk to a Contractor's facility Assists the Contractor to receive its FCL Performs Pre-Assessment research and conducts the Annual Assessment Reviews Security Violation <i>Final Reports</i> submitted by FSOs and conducts Administrative Inquiries Assists the FSO and/or FCB in the Invalidation, Revocation, Revalidation, and Termination processes
Joint Personnel Adjudication System (JPAS)	<ul style="list-style-type: none"> Standardizes the adjudication process within DoD, and provides a database and processes within the security manager realm of functions
Key Management Personnel (KMP)	<ul style="list-style-type: none"> Individuals required to be cleared or excluded as determined by the Cognizant Security Agency or when delegated, its CSO, as part of issuing a Facility Security Clearance. This may include Owners, Officers Directors, Executive Personnel, Partners, LLC Members, Managers, Trustees, Regents, Proxy Holders, NISP Facility Security Officer, Insider Threat Program Manager, etc.



Roles	Responsibilities
National Industrial Security Program Operation Manual (NISPOM)	<ul style="list-style-type: none"> Provides baseline standards for the protection of classified information released or disclosed to industry in connection with classified contracts under the NISP
National Industrial Security Program (NISP)	<ul style="list-style-type: none"> Program outlining criteria for cleared facilities to safeguard classified information while performing work on contracts, programs, bids, or research and development efforts
Prime Contractor	<ul style="list-style-type: none"> Provides sponsorship for a Contractor to obtain a FCL Responsible for ensuring that sub-contractors have a valid FCL Responsible for reporting information that may affect their FCL and their subcontractors FCL to DSS.
Senior Management Official (SMO)	<ul style="list-style-type: none"> Contractor's senior most official at the facility
Secure Web Fingerprint Transmission (SWFT)	<ul style="list-style-type: none"> System used to submit fingerprints for e-QIPs
Security Training, Education and Professionalization (STEPP)	<ul style="list-style-type: none"> Program maintaining the list of courses DSS provides Contractor's security professionals
Telephonic Survey	<ul style="list-style-type: none"> Robust informal survey conducted by ISR with FSO to walk through the requirements of the FCL process; occurs 5 – 10 days after receipt of FCL Orientation Handbook

D.2 Business Structure

Roles	Responsibilities
General Partnership	<ul style="list-style-type: none"> Refers to an association of persons or an unincorporated company with the following major features: created by agreement, proof of existence and estoppel, formed by two or more persons, and the owners are all personally liable for any legal actions and debts the company may face
Highest Cleared Facility	<ul style="list-style-type: none"> Parent company that has previously received its FCL and provides updates on Intermediate Tiered company's while its subsidiary is going through its FCL process
Intermediate Excluded Company	<ul style="list-style-type: none"> Subsidiary of the Ultimate Excluded Entity and a parent of the facility undergoing the FCL process. It is also excluded from reviewing classified information its subsidiary is contracted to perform by a Prime Contractor or GCA
Joint Venture	<ul style="list-style-type: none"> Business agreement in which the parties agree to develop, for a finite time, a new entity and new assets by contributing equity. They exercise control over the enterprise and consequently share revenues, expenses and assets
Limited Partnership	<ul style="list-style-type: none"> Partnership in which only one partner is required to be a general partner
Limited Liability Company	<ul style="list-style-type: none"> Flexible form of enterprise that blends elements of partnership and corporate structures. An LLC is not a corporation; it is a legal form of company that provides limited liability to its owners in the vast majority of United States jurisdictions



Roles	Responsibilities
Privately Held Corporation	<ul style="list-style-type: none">Owned either by non-governmental organizations or by a relatively small number of shareholders or company members which does not offer or trade its company stock (shares) to the general public on the stock market exchanges, but rather the company's stock is offered, owned and traded or exchanged privately
Publicly Held Corporation	<ul style="list-style-type: none">Offers its securities (stock/shares, bonds/loans, etc.) for sale to the general public, typically through a stock exchange, or through market makers operating in over the counter markets
Sponsored Facility	<ul style="list-style-type: none">Facility sponsored by a Prime Contractor or GCA to receive a FCL to perform classified government work
Sole Proprietorship	<ul style="list-style-type: none">Refers to a type of business entity that is owned and run by one individual and in which there is no legal distinction between the owner and the business.
Tiered Company (Parent Company)	<ul style="list-style-type: none">Defined as a company owning at least a majority of another company's voting securities
Ultimate Excluded Entity	<ul style="list-style-type: none">Highest parent company facility that is excluded from reviewing classified information its subsidiary is contracted to perform by a Prime Contractor or GCA